

VALENCIA MANAGEMENT LLC SERIES	)	CASE NO.: 2:22-cv-00345-APG-DJA
4, a Nevada limited liability company,	)	
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER TO</b>
vs.	)	<b>EXTEND TIME TO RESPOND TO</b>
	)	<b>NEWREZ LLC, F/K/A NEW PENN</b>
NEWREZ LLC, F/K/A NEW PENN	)	<b>FINANCIAL, LLC, D/B/A</b>
FINANCIAL, LLC, D/B/A SHELLPOINT	)	<b>SHELLPOINT MORTGAGE</b>
MORTGAGE SERVICING; NATIONAL	)	<b>SERVICING'S MOTION FOR</b>
DEFAULT SERVICING CORPORATION,	)	<b>JUDGMENT ON THE PLEADINGS</b>
DOE individuals I through XX; and ROE	)	<b>(First Request)</b>
CORPORATIONS I through XX,	)	
	)	
Defendants.	)	
	)	

Plaintiff VALENCIA MANAGEMENT LLC SERIES 4 (“Plaintiff”) and Defendant NEWREZ LLC, F/K/A NEW PENN FINANCIAL, LLC, D/B/A SHELLPOINT MORTGAGE SERVICING (“Defendant”), by and through their attorneys of record, after meeting and conferring on August 16, 2022, hereby submit this Stipulation for an extension of time for Plaintiff to respond to Defendant’s Motion for Judgment on the Pleadings [Doc #26] (“Motion for Judgment”), from the current date of August 26, 2022 to September 9, 2022.

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This is the first request for an extension of time to respond to the Motion for Judgment. This extension is sought in good faith, and is not intended to cause any delay or prejudice to any party.

DATED this 16<sup>th</sup> day of August 2022

**CLARK NEWBERRY LAW FIRM**

/s/ Aimee Clark Newberry  
 AIMEE CLARK NEWBERRY, ESQ.  
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*Attorney for Valencia Management LLC Series #4*

DATED this 16<sup>th</sup> day of August 2022

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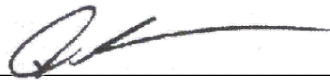
### ORDER

IT IS HEREBY ORDERED that Plaintiff shall file its Opposition to Defendants' Motion for Judgment on or before September 9, 2022.

Respectfully submitted by:

**CLARK NEWBERRY LAW FIRM**

/s/ Aimee Clark Newberry  
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 UNITED STATES DISTRICT COURT  
 DATED: August 17, 2022